

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 5/12/2023



The post-discovery conference currently scheduled for May 12, 2023 at 11:00 AM is hereby ADJOURNED. Defense counsel shall contact Bare Hill Correctional Facility and provide a status update by May 22, 2023 as to which facility Plaintiff has been transferred to.

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

**THE CITY OF  
LAW DEPARTMENT**

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May 11, 2023

**BY ECF**

Honorable Vernon S. Broderick  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Quame Truitt v. Willie Perry  
22 Civ. 3407 (VSB)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendant Willie Perry in the above-referenced matter.<sup>1</sup> I write to respectfully request an adjournment of the telephonic post-discovery conference currently scheduled for May 12, 2023 at 11:00 a.m. This is the defendant's first request of this kind. The undersigned was unable to contact plaintiff for his consent due to his current incarceration status and transfer to another Department of Corrections and Community Supervision ("DOCCS") facility.

In accordance with Your Honor's April 10, 2023 Revised Case Management Plan and Scheduling Order, Assistant Corporation Esther Kim contacted the Bare Hill Correctional Facility to arrange for the production of plaintiff for the telephonic post-discovery conference currently scheduled for May 12, 2023 at 11:00 a.m. However, when Ms. Kim reached out to the DOCCS liaison at Bare Hill Correctional Facility on May 11, 2023 to confirm that plaintiff will be produced for tomorrow's conference, she was informed that plaintiff cannot be produced because plaintiff is being transferred to another facility and they can only provide us with the

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<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Esther Kim, who is awaiting admission to the New York Bar. Ms. Kim is handling this matter under my supervision and may be reached at (212) 356-2340 or eunkim@law.nyc.gov.

information of the new facility once plaintiff's transfer is finalized. As of the submission of this letter, the DOCCS liaison has not provided further information regarding plaintiff's transfer.

Accordingly, as it appears that plaintiff will not be available to participate in the post-discovery conference scheduled for May 12, 2023 at 11:00 a.m. as a result of his transfer, the undersigned respectfully requests that the Court adjourn the telephonic post-discovery conference currently scheduled for May 12, 2023 at 11:00 a.m. to a date and time convenient for the Court.

Thank you for your consideration herein.

Respectfully submitted,

*Inna Shapovalova*

Inna Shapovalova  
*Senior Counsel*  
Special Federal Litigation Division

cc: **BY FIRST-CLASS MAIL**  
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